



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 18, 2009

Susan Frank Bullock, Treasurer  
First State PAC  
P.O. Box 3006  
Wilmington, DE 19804

Response Due Date:  
December 23, 2009

Identification Number: C00363648

Reference: Mid-Year Report (1/01/09 – 6/30/09)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Please clarify all expenditures made for "Catering & Office Expenses," "Catering/FacilityRental," "Catering/Travel/Event & Office Expenses," "Fundraising Consulting Expenses," and "Fundraising Consulting Services" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E, supporting Lines 23 or 24, and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

2. Schedule B supporting Line 21(b) of your report discloses a payment(s) to another political committee(s) for goods and/or services provided by that committee(s). 11 CFR §100.52(d)(1) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.52(d)(2)

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